

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

PETER ST. LAURENT,
Plaintiff
v.
UNITED PARCEL SERVICE,
Defendant

11/01/2004 P 1:53

CIVIL ACTION NO. 04-CV-11951-FDS

STATEMENT PURSUANT TO LOCAL RULE 16.1(D)

The Plaintiff, Peter St. Laurent, state that he conferred with the Defendant, through counsel, in this matter and Mr. St. Laurent hereby submits a Statement Pursuant to Local Rule 16.1(D). While the parties agree on the dates proposed, the Defendant submitted its own Statement, and thus the Plaintiff is also submitting a statement with matching dates.

A. Proposed Pre-Trial Schedule

1. Initial disclosures by: December 2, 2004
2. Amendments to pleadings to add parties by: December 15, 2004
3. Completion of written discovery and fact depositions by: April 1, 2005
4. Plaintiff's designation of expert witnesses by: May 2, 2005
5. Defendant's designation of expert witnesses by: June 15, 2005
6. Expert depositions by: August 1, 2005
7. Dispositive Motions by: September 1, 2005
8. Final Pre-Trial Conference by: December 1, 2005

- B. The parties have not yet determined whether they will consent to trial by magistrate judge.
- C. The plaintiff has presented a written settlement proposal to the defendant.
- D. The parties' certifications pursuant to Local Rule 16.1(D)(3) will be submitted.

Respectfully submitted,

The plaintiff,
By his Attorneys,

KECHES & MALLEEN, P.C.


SETH J. ELIN
BBO # 636099
122 Dean Street
Taunton, MA 02780
(508) 822-2000

DATED: October 28, 2004
Certif-16.1D3

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above
document was served upon the attorney(s)
of record for each other party by mail/hand
on 10/28/04.

